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September 4, 2024

**VIA ECF**

Honorable Jennifer H. Rearden, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New Yor, New York 10007

**Re: Restrepo v. Monte's Trattoria, LTD et. al., 1:24-cv-4482(JHR)**  
**2<sup>nd</sup> Letter Motion for Extension of Time to Respond to the Complaint**

Your Honor:

The parties have conferred regarding potential settlement and mediation. With Plaintiff's consent, Defendants respectfully request an additional 60-day extension of time to respond to the Complaint, and further request that the Court cancel the court appointed mediation currently scheduled for September 17, 2024. The parties agreed to engage a private mediator to resolve this matter. Defendants made one prior request for an extension of time to answer the complaint, in a letter dated, also with the consent of Plaintiff's counsel.

The reason for this request is to allow sufficient time for the exchange of documents in preparation for mediation, and to allow adequate time to identify an available date for the mediator. I have conferred with Mr. Kirschenbaum, counsel for the Plaintiff, and he has consented to the extension and the proposed plan to advance mediation.

Truly yours,

/s/

Elan Parra, Esq.

Cc: Daniel Maimon Kirschenbaum (Via ECF)  
Clients (Via Email)